

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

IN RE: )  
 )  
American Family Entertainment Centers, ) Bankruptcy Case No.: 09-08966-dd  
 ) Chapter 7  
 )  
Debtor. )

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**APPLICATION TO EMPLOY ATTORNEY**

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The Application of Kevin Campbell respectfully represents:

1. The Trustee in the above-captioned case requests that the court authorize him to employ the Campbell Law Firm, P.A. as attorneys for the Trustee. 11 U.S.C. §327(a).
2. The Trustee wishes to employ the Campbell Law Firm, P.A., all members of which have been admitted to practice in this Court, of Post Office Box 684, Mt. Pleasant, SC 29465, telephone number is (843)884-6874 to represent him in this case.
3. The professional services that the Campbell Law Firm, P.A. are to render include, but may not be limited to the following:

- (a) To represent the Trustee in all legal disputes which involve property of the estate;
- (b) To prepare, file and/or pursue any necessary Pleadings, including Adversary Proceedings, Answers, Orders, Discovery requests, Motions and similar documentation;
- (c) To represent the Trustee in any sale of property of the estate, if necessary;
- (d) To pursue the collection of accounts receivable if a demand letter from the Trustee does not bring results;
- (e) To conduct research, when necessary, relative to any legal issues that may arise during the administration of the case;
- (f) To prepare and pursue objections to discharge action or to seek the revocation of the debtor's discharge if grounds exist;
- (g) To determine if legal action needs to be taken for the Trustee to exercise any of his strong arm powers;
- (h) To negotiate, mediate, arbitrate or litigate all legal disputes on behalf of the Trustee; and
- (i) Generally, to handle all legal issues involved in the case and to advise the Trustee on the proper legal actions to be taken.

4. The Trustee desires to employ the Campbell Law Firm, P.A. under a general retainer, with a proposed compensation of \$325.00 per hour for Kevin Campbell; \$300.00 per hour for Michael H. Conrady; \$150.00 per hour for Suzanne Campbell Chisholm; and \$90.00 per hour for staff. The Campbell Law Firm understands the compensation is subject to approval by the Court. The Trustee and the Campbell Law Firm, P.A. understand that the Campbell Law Firm P.A.'s compensation will be set by the court, pursuant to 11 U.S.C. §330(a) and that the amount of compensation awarded by the Court may differ from that agreed upon between them.

5. The Trustee desires to employ to Campbell Law Firm because the attorneys have handled numerous bankruptcy issues for him in the past, the lawyers are familiar with the unique legal issues that may arise in a bankruptcy case and with the Bankruptcy Code and the attorneys are competent to handle the matters assigned to them.

6. To the best of the Trustee's knowledge and information, the Campbell Law Firm, P.A. is a disinterested person as that term is defined by 11 U.S.C. §101(14) and that the Campbell Law Firm, P.A. does not hold or represent an interest adverse to the estate.

7. The Campbell Law Firm, P.A. has no connections with the Debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee or any person employed in the office of the United States Trustee, except that the Trustee serves on the panel of Chapter 7 Trustees appointed, maintained and supervised by the United States Trustee and the Trustee is routinely appointed to cases by the United States Trustee. The Campbell Law Firm, P.A. has represented and is currently representing the Trustee in his capacity as Trustee in the majority of the Trustee's other cases. Kevin Campbell, the Trustee, is a partner in the Campbell Law Firm, P.A.

WHEREFORE, the Trustee prays that this court issue its order authorizing him to employ the services of Campbell Law Firm as attorney for the estate of the above Debtor; to perform such services as your Trustee sees fit in connection with the administration of this estate; and that such attorney be paid at a fee to be subsequently approved by this court; and for such other and further relief as to this court seems just and proper.

/s/ Kevin Campbell

KEVIN CAMPBELL, Trustee  
Post Office Box 684  
Mt. Pleasant, SC 29465  
(843) 884-6874/ 884-0997 (fax)  
District Court ID No.: 30  
[kcampbell@campbell-law-firm.com](mailto:kcampbell@campbell-law-firm.com)

MT. PLEASANT, SOUTH CAROLINA  
Dated: February 5, 2010

UNITED STATES BANKRUPTCY COURT  
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**STATEMENT OF NO INTEREST**

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I, Kevin Campbell, hereby make solemn oath:

1. The Campbell Law Firm, P.A. is comprised of three attorneys who are duly admitted to practice in the State of South Carolina and in this court.

2. The Campbell Law Firm, P.A. maintains only one office at 890 Johnnie Dodds Blvd., Mt. Pleasant, SC 29465.

3. The Trustee has requested that Campbell Law Firm, P.A. be allowed to represent the Trustee in this case. The services to be performed by the attorneys are outlined in the Application being filed simultaneously.

4. To the best of my knowledge, the Campbell Law Firm, P.A. and all members of the firm are disinterested persons in this case as that term is defined in 11 U.S.C. § 101(14). The Campbell Law Firm, P.A., nor any of the individual lawyers, hold or represent an interest adverse to the estate.

5. That neither I nor the Campbell Law Firm, P.A. have any connections with the Debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee or any person employed in the office of the United States Trustee except, that Kevin Campbell, who is a partner in the firm, serves on the panel of Chapter 7 Trustees appointed, maintained and supervised by the United States Trustee. Kevin Campbell is routinely appointed to cases by the United States Trustee and the Campbell Law Firm, P.A. has represented the Trustee in his capacity as Trustee in the majority of his other cases.

6. Campbell Law Firm, P.A., and individual attorneys have agreed that the Campbell Law Firm, P.A. will be employed on a general retainer basis, that the Campbell Law Firm, P.A. attorney's will bill at their customary rate of \$325.00 per hour for Kevin Campbell, and \$300.00 per hour for Michael Conrad; \$150.00 per hour for Suzanne Campbell Chisholm. Their support staff shall submit bills for legal work performed at a rate of \$90.00 per hour. The Trustee and the Campbell Law Firm, P.A. understand that the Campbell Law Firm's compensation shall be reviewed and set by the Court, pursuant to 11 U.S.C. § 330(a) and they understand that the amount of compensation they receive may differ from the bills that are submitted.

/s/ Kevin Campbell  
KEVIN CAMPBELL, Trustee  
Post Office Box 684  
Mt. Pleasant, SC 29465  
(843) 884-6874 / 884-0997 (fax)  
District Court ID No.: 30  
[kcampbell@campbell-law-firm.com](mailto:kcampbell@campbell-law-firm.com)

MT. PLEASANT, SOUTH CAROLINA  
Dated: February 5, 2010

/s/ Meghan M. Riser  
NOTARY PUBLIC FOR THE STATE  
OF SOUTH CAROLINA  
My Commission Expires: 8-10-19